

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IDEATIVE PRODUCT VENTURES, INC., §
§
Plaintiff, §
§
VS. §
§
TARGUS, INC., §
§
Defendant. §

Civil Action No. 4:12-cv-278-RC-ALM

JURY DEMANDED

UNOPPOSED MOTION TO DISMISS WITH PREJUDICE

Plaintiff, Ideative Product Ventures, Inc. (“Ideative”), pursuant to Federal Rules of Civil Procedure 41(a)(2) and (c), hereby moves for an order dismissing all claims asserted between Ideative and Defendant, Targus, Inc. (“Targus”), with prejudice. In support of this motion, Plaintiff states:

1. Ideative and Targus have compromised and have settled the claims that they have asserted against each other in this case.
2. In connection with their compromise and settlement, Ideative and Targus have agreed to seek dismissal, with prejudice, of their claims in this case.
3. A proposed order of dismissal of all claims in this case is attached to this motion.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Ideative Product Ventures, Inc., respectfully requests the Court to enter an order of dismissal with prejudice of all the parties’ claims in this case.

Dated: February 6, 2013

Respectfully Submitted,

/s/ James E. Davis

JAMES E. DAVIS

State Bar No. 05504200

Kelly J. Kubasta

State Bar No. 24002430

Todd C. Basile

State Bar No. 24078205

KLEMCHUK KUBASTA, L.L.P.

8150 N. Central Expressway, 10th Floor

Dallas, Texas 75206

(214) 367-6000 - Telephone

(214) 367-6001 – Facsimile

jim.davis@kk-llp.com

kelly.kubasta@kk-llp.com

todd.basile@kk-llp.com

docketing_kkllp@me.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

The undersigned, counsel of record for Plaintiff, Ideative Product Ventures, Inc., certifies that he has complied with the meet and confer requirement in Local Rule CV-7(h) by conferring with Defendant's counsel, Kenneth B. Black, regarding the foregoing motion and Defendant's counsel has indicated the foregoing motion is unopposed.

/s/ James E. Davis

James E. Davis

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on February 6, 2013.

/s/ James E. Davis

James E. Davis